

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION NO. 17-cv-05806-RJB

DECLARATION OF ANDREA  
BRENNEKE IN SUPPORT OF  
PLAINTIFF STATE OF  
WASHINGTON'S RESPONSE TO THE  
GEO GROUP, INC.'S RULE 52  
MOTION FOR JUDGMENT AS A  
MATTER OF LAW

Pursuant to 28 U.S.C. § 1746(2), I, Andrea Brenneke, state and declare as follows:

1. I am over eighteen years of age. I have personal knowledge of, and am competent to testify about, the matters contained herein.

2. I am an Assistant Attorney General for the Office of the Attorney General of Washington and one of the attorneys representing the State of Washington in this matter.

3. Attached hereto as Exhibits A-S are true and correct copies of excerpts of the trial transcript as follows:

Exhibit No.	Date	Testimony
Exhibit A	Nov. 2, 2021	Unjust Enrichment Order
Exhibit B	Oct. 13, 2021	William McHatton, former GEO Associate Warden and Compliance Manager
Exhibit C	Oct. 14, 2021 Oct. 15, 2021 Oct. 19, 2021 Oct. 20, 2021	Bertha Henderson, GEO Food Service Manager

Exhibit D	Oct. 19, 2021	Charles Hill, GEO Director of Business Management, Western Region
Exhibit E	Oct. 13, 2021	Alisha Singleton, former GEO Classification Officer
Exhibit F	Oct. 14, 2021	John Patrick Griffin, former GEO Cook Supervisor
Exhibit G	Oct. 15, 2021	David Tracy, GEO Detention Officer
Exhibit H	Oct. 15, 2021	Marc Johnson, GEO Detention Officer
Exhibit I	Oct. 19, 2021 Oct. 21, 2021	Brian Evans, GEO Chief Financial Officer
Exhibit J	Oct. 13, 2021	Washington Opening
Exhibit K	Oct. 19, 2021	Robbin Gard, Work Source Supervisor, Employment Security Division
Exhibit L	Oct. 26, 2021	Washington Closing
Exhibit M	Oct. 29, 2021	Dr. Peter Nickerson, Labor Economist, Washington's Expert
Exhibit N	Oct. 18, 2021	Orlando Marquez, former detainee worker
Exhibit O	Oct. 15, 2021	Goodluck Nwauzor, Class Representative
Exhibit P	Oct. 19, 2021	Maria Nayra Gomez Sotelo, former detainee worker
Exhibit Q	Oct. 21, 2021	Joshua Grice, L&I
Exhibit R	Oct. 26, 2021	The Court
Exhibit S	Oct. 25, 2021	Amber Martin, GEO Vice President, Contract Administration

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 29th day of November 2021 in Seattle, Washington.

s/ Andrea Brenneke  
ANDREA BRENNEKE, WSBA No. 22027

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated this 29th day of November 2021.



CAITILIN HALL  
Legal Assistant